

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2006-___-C

IN RE:

Petition of NuVox
Communications, Inc for
Expedited Review of Growth
Code Denial by the Number
Pooling Administrator Relating
to The State of South Carolina
Military Department

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**MOTION FOR PROTECTIVE TREATMENT AND
BASIS FOR FILING EXHIBITS B AND C AS TRADE SECRET**

Introduction

NuVox Communications, Inc. ("NuVox"), by its attorneys and pursuant to S.C. Code Ann. § 39-8-10, *et seq.*, and all other applicable rules, statutes and regulations, hereby files this Motion for Protective Treatment ("Motion") in the above-captioned proceeding. By this Motion, the Applicants seeks protective treatment by the South Carolina Public Service Commission ("Commission"), of certain commercially-sensitive documents, namely, the Central Office Code (NXX) Assignment Request, and the CO Code Assignment Months to Exhaust Certification Worksheet submitted to NeuStar on or about August 11, 2006, seeking assignment of a new NXX code (10,000 numbers) to meet the demands of its customers. The requests and worksheet are being filed separately under seal as Confidential Exhibits "B" and "C" respectively to the Petition for Expedited Review of the Central Office Code Denial.

In support of this Motion, the Applicants provides the following:

1. The exact legal name, address and telephone number of the Applicants are:

NuVox Communications
2 North Main Street
Greenville, South Carolina 29601
Telephone (864) 331-7323

2. Correspondence or communications regarding this Motion should be addressed to:

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I. Description of Confidential Information.

3. The Petition requires NuVox to disclose information sufficient to demonstrate its entitlement to the relief requested. These documents contain highly confidential and strictly proprietary information, the public disclosure of which may result in direct, immediate and substantial harm to the competitive position of the Applicant in South Carolina and elsewhere.

II. Grounds for Claim of Confidentiality.

4. The documents attached as *Exhibits B and C* to the Petition are not readily available to persons external to NuVox.

5. Because the documents submitted by NuVox in support of the Petition contain confidential and commercially-sensitive information from which its competitors may derive economic value, NuVox seeks to protect such material from public disclosure. NuVox derives independent economic value from the fact that significant, detailed and proprietary information regarding its actual and forecasted use of numbering resources is unknown to its competitors. As

such, these documents contain “trade secrets” as that term is used in the South Carolina Trade Secrets Act. *S.C. Code Section 39-8-20(5)*. Given this fact, the disclosure of this information could provide existing and potential competitors, in South Carolina as well as in other states in which NuVox provides or intends to provide telecommunications service, with an unfair and undeserved competitive advantage.

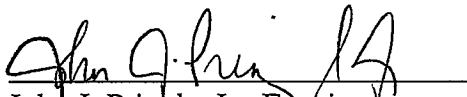
6. NuVox clarifies herein that its request for protection applies only to the documents attached as *Exhibits B and C* to the Petition.

Conclusion

7. The information included in support of its Petition, for which Confidential Treatment is sought, is both proprietary and competitively-sensitive. The substantial and direct harm that could be caused to NuVox as a result of any disclosure is real and not speculative. For these reasons, the documents attached as *Exhibits B and C* to the Petition should be protected from public disclosure by the Commission.

WHEREFORE, NuVox Communications, Inc. respectfully requests that the South Carolina Public Service Commission grant this Motion for Protective Treatment with respect to the commercially-sensitive documents attached as *Exhibits B and C* to the Petition of NuVox Communications, Inc for Expedited Review of Growth Code Denial by the Number Pooling Administrator Relating to The State of South Carolina Military Department and filed *under seal* as Confidential in this proceeding.

Respectfully submitted,



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August 21, 2006
Columbia, South Carolina